

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES & EXCHANGE COMMISSION,

Plaintiff,

v.

GIBRALTAR GLOBAL SECURITIES, INC.,  
and WARREN A. DAVIS,

Defendants.

13 CV 2575 (GBD) (JCF)

**DECLARATION OF  
PHILIP C. PATTERSON**

Pursuant to 28 U.S.C. § 1746, **PHILIP C. PATTERSON** declares:

1. I am counsel to the law firm of De Feis O'Connell & Rose, P.C., attorneys for Gibraltar Global Securities, Inc. ("GGSI") and Warren A. Davis, the defendants in the above-captioned action. I am fully familiar with the facts contained herein. I submit this declaration in support of the defendants' motion to dismiss the Complaint against them pursuant to Federal Rule of Civil Procedure 12(b)(6) or, alternatively, for consolidation pursuant to Federal Rule of Civil Procedure 42.

2. Annexed hereto as Exhibit A is a copy of the SEC's Complaint in *SEC v. Magnum d'Or Resources, Inc. et al.*, No. 11-60920 (S.D. Fl.) (Docket No. 1).

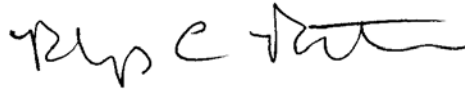
3. On May 29, 2013 and July 16, 2013, I entered the website address [www.ggsibahamas.com](http://www.ggsibahamas.com) into the search function on the website [www.Hupso.com](http://www.Hupso.com). Both times, the results stated that [www.ggsibahamas.com](http://www.ggsibahamas.com) receives 2,212 visitors per day. Neither result provided any information about the geographical location of those visitors.

4. On May 29, 2013 and July 16, 2013, I entered the website address "webstatsdomain.com" into an internet browser. On both occasions, the internet browser was

redirected to the website address “www.webstatsdomain.net.” I thereafter entered the web domain “ggsibahamas.com” into the search function on www.webstatsdomain.net. Neither result provided any information about the geographical location of visitors to the ggsibahamas.com domain.

5. WHEREFORE, for the reasons set forth in the accompanying Memorandum of Law, I respectfully request that the Court dismiss the Complaint against the defendants and grant such other and further relief as the Court deems just and proper.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 19, 2013.



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Philip C. Patterson (PP-9995)

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